

# EXHIBIT 12

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**STATE OF MARYLAND; STATE OF  
DELAWARE; STATE OF CALIFORNIA; STATE  
OF COLORADO; STATE OF ARIZONA; STATE  
OF CONNECTICUT; DISTRICT OF  
COLUMBIA, STATE OF HAWAII; STATE OF  
ILLINOIS; OFFICE OF THE GOVERNOR *ex rel.*  
Andy Beshear, in his official capacity as Governor  
of the COMMONWEALTH OF KENTUCKY;  
STATE OF MAINE; COMMONWEALTH OF  
MASSACHUSETTS; PEOPLE OF THE STATE  
OF MICHIGAN; STATE OF MINNESOTA;  
STATE OF NEVADA; STATE OF NEW  
JERSEY; STATE OF NEW MEXICO; STATE OF  
NEW YORK; STATE OF NORTH CAROLINA;  
STATE OF OREGON; JOSH SHAPIRO, in his  
official capacity as Governor of the  
COMMONWEALTH OF PENNSYLVANIA;  
STATE OF RHODE ISLAND; STATE OF  
VERMONT; STATE OF WASHINGTON; STATE  
OF WISCONSIN;**

**Plaintiffs,**

**v.**

**CORPORATION FOR NATIONAL AND  
COMMUNITY SERVICE, operating as  
AmeriCorps; and JENNIFER BASTRESS  
TAHMASEBI, in her official capacity as Interim  
Head of the Corporation for National and  
Community Service;**

**Defendants.**

**Civ. No. 25-cv-01363 (DLB)**

**DECLARATION OF LEAH J. LARAMEE**

Pursuant to 28 U.S.C. § 1746, I, Leah J. Laramee, declare as follows:

1. I am a resident of the State of Hawai‘i. I am over the age of 18 and have personal knowledge of all the facts stated herein, including knowledge based on my role and experience.

If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the Department of Land and Natural Resources (“DLNR”) as the DLNR Climate Change Mitigation and Adaptation Coordinator.

3. The DLNR is responsible for enhancing, protecting, conserving, and managing Hawai‘i’s unique and limited natural, cultural, and historic resources held in public trust for current and future generations of the people of Hawai‘i, and its visitors, in partnership with others from the public and private sectors.

4. The DLNR Climate Change Mitigation and Adaptation Commission (“CCMAC”) was created as Hawai‘i’s initiative to promote ambitious, climate-neutral, culturally responsive strategies for climate change adaptation and mitigation in a manner that is clean, equitable, and resilient.

5. As the DLNR Climate Change Mitigation and Adaptation Coordinator, I coordinate the AmeriCorps VISTA projects for DLNR.

6. CCMAC partners with AmeriCorps to implement programs to fight poverty and empower communities by supporting data collection, outreach, education, and information dissemination to vulnerable communities, which in turn helps these communities employ strategic actions to become resilient to climate related disasters.

7. Through the partnership between CCMAC and AmeriCorps, AmeriCorps VISTA positions work together with CCMAC to build social infrastructure, expand community partnerships, build VISTA participant capacity and overall capacity within and among State

departments and agencies, and secure long-term resources to help create pathways for low-income communities to develop economic and social resilience.

8. The program provides ten VISTA positions for work in critical areas such as: climate change, natural resource protection, natural disaster prevention, natural disaster recovery, energy affordability, community building, and transportation access.

9. The VISTA program specifically addresses Hawai'i's unique challenges as an island state, including its vulnerability to natural disasters, high energy costs, and transportation issues.

10. The VISTA program's participants help develop strategies for energy affordability and efficiency, community outreach for underserved populations, and climate adaptation planning.

11. In addition to those administrative and logistical functions, AmeriCorps committed \$224,575 in congressionally appropriated federal funds to support this program in the current fiscal year. In past years, AmeriCorps invested \$999,888 in this program run by CCMAC.

12. CCMAC's partnership with AmeriCorps also generated additional nonfederal financial support for the program in the amount of \$160,000.

13. Without the administrative and logistical support of AmeriCorps, and the investment of the federal funds in this program, the benefits noted above will be lost.

14. On April 25, 2055, I received notification via electronic mail sent from [AmeriCorpsAwardAction@americorps.gov](mailto:AmeriCorpsAwardAction@americorps.gov) by Jennifer Bastress Tahmasebi, Interim Agency Head, that the VISTA program was terminated per 2 CFR 200.340(a)(4) because it "no longer effectuates agency priorities."

15. As of the date of this declaration, \$209,575 of the federal funds approved for this program had not been drawn down.

16. The steps taken to dismantle AmeriCorps and cancel this grant will effectively terminate the CCMAC VISTA program, resulting in 15,120 hours of service lost. Those hours are critical to CCMAC's work in the area of climate resilience and CCMAC does not have resources to replace them.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Executed on April 30, 2025, at Honolulu, Hawai'i.



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LEAH J. LARAMÉE